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January 4, 2018

Via ECF

Hon. Gregory H. Woods
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: NFL Properties LLC v. Zeikos, Inc., No. 17-09190 (GHW)

Dear Judge Woods:

We represent the Plaintiff, NFL Properties LLC (“NFLP”), in the above-captioned matter. Last week the Court granted Defendant Zeikos, Inc.’s (“Zeikos”) application to adjourn Zeikos’ deadline to respond to the Complaint filed by NFLP in this matter (originally due on or before December 27, 2017) to January 26, 2018. *See* ECF Doc. No. 13 (the “Memo Endorsement”). The Court also adjourned the initial pretrial conference in this matter (originally scheduled for January 23, 2018) to February 1, 2018. *Id.* We write pursuant to Rule 1.E of the Court’s Individual Rules Of Practice In Civil Cases to respectfully request that the Court further adjourn the Initial Pretrial Conference, scheduled for February 1, 2018, to a date of the Court’s convenience after February 6, 2018.

NFLP respectfully submits this adjournment is necessary for two reasons. *First*, lead counsel for NFLP will be traveling on business between February 1 and February 5, 2018, and will therefore be unavailable to attend the Initial Conference Pretrial Conference on February 1. *Second*, and perhaps more importantly, pursuant to the Court’s Individual Rules of Practice and last week’s Memo Endorsement, under the current schedule the parties’ joint status letter and proposed case management plan are due no later than January 25, 2018 -- one day *prior to* Zeikos’ deadline to respond to the Complaint. As a result, under the current schedule, the parties will likely be required to confer regarding discovery -- and agree upon the parameters of such discovery -- before NFLP has had any opportunity to review Zeikos’ response to the Complaint. The requested extension is intended to address this timing issue.

This is Plaintiff’s first request to reschedule the Initial Pretrial Conference. We have conferred with Zeikos’ counsel regarding this request and have been informed that Zeikos consents to the requested adjournment.

We thank the Court for its attention to this matter.

Respectfully,

/s/ Charles L. Glover, Esq